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WASTE
MANAGEMENT PROGRAM

27.080
GAF Corporation

June 20, 1984

LOW #84-SL.012

Mr. Jerry Lebo
Plant Manager
GAF Corporation
9215 Riverview Drive
St. Louis, Missouri 63137

Dear Mr. Lebo:

Enclosed please find the report of compliance based upon a recent inspection conducted by my staff, pursuant to the federal and state hazardous waste management laws and implementing regulations.

We are requesting that you provide our office with a written response documenting steps taken to comply with the recommendations presented in the report within 30 days of receipt of this letter.

Thank you for your cooperation. Please advise should further clarification or assistance be needed.

Sincerely,

Mike Duvall

Mike Duvall
Chief - Waste Management Unit
St. Louis Regional Office

MD/bkl

✓ CC: Central Office - Waste Management Program

MISSOURI DEPARTMENT OF NATURAL RESOURCES
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

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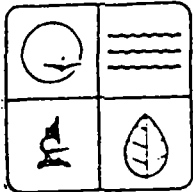
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Superfund

0400

Christopher S. Bond Governor
Fred A. Lafser Director



27.080
GAF Corporation
June 20, 1984

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

GAF Corporation
Building Products Division
9215 Riverview Drive
St. Louis, Missouri 63137
(314) 867-7800

MDNR Generator #: 01707
EPA ID#: MODO53967584

Mr. Jerry Lebo, Plant Manager

INTRODUCTION

An inspection of the GAF Corporation - St. Louis Plant was conducted on May 10, 1984 to assess compliance with all applicable requirements pursuant to the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management (MoHWM) Law. Mike Duvall, Chief - Waste Management Unit and Joe Haake, Environmental Specialist represented the Missouri Department of Natural Resources - St. Louis Regional Office (MDNR-SLRO). Mr. Jerry Lebo represented GAF Corporation and accompanied the agency inspectors throughout the plant visit.

The GAF - St. Louis Plant manufactures and distributes rigid polyurethane material used for roofing insulation. The production of this material involves the reaction of formulated polyol resin and polymeric methylene diisocyanate. The reaction is aided by the addition of a catalyst, a surfactant, and trichlorofluoromethane to the polyol. According to Mr. Lebo no hazardous wastes are currently being generated.

UNSATISFACTORY FEATURES

1. Two 55-gallon drums of methylene chloride waste as well as several 55-gallon drums of unknown wastes have not been registered with MDNR-Waste Management Program (WMP) nor properly managed per regulation 10 CSR 25-5.010.
2. The facility has not registered with the MDNR-WMP as a generator of waste oil per regulation 10 CSR 25-4.020(2)(A).

DISCUSSION

About 200 drums of waste remain stored in a vacant area of the plant. This waste, as noted in the previous June 25, 1982 inspection report, is made up of formulated polyol and methylene diisocyanate from the pre-mix stage of past operations. None of the waste components are listed as hazardous except trichlorofluoromethane which is regulated only as a spent halogenated solvent.

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Presently the waste polyol and methylene diisocyanate are absorbed in a sawdust pile and disposed of as a conventional solid waste at an Illinois landfill. Prior to emptying the polyol drums, the tops are vented to release the trichlorofluoromethane to the atmosphere.

Included with the waste polyol and methylene diisocyanate are two drums of methylene chloride and several drums of unknown waste material. Although hazardous wastes are currently not being generated at this facility, the methylene chloride must be registered with the MDNR-WMP and managed according to the Missouri Hazardous Waste Management Law. The unknown wastes must be identified and managed accordingly.

GAF originally notified with the U.S. Environmental Protection Agency (EPA) as a generator and TSD facility. Mr. Lebo stated that this regulation reflected an earlier approach intended to cover the accumulated polyol and methylene diisocyanate prior to the non-hazardous determination. At this time it is unknown if interim TSD status has been withdrawn by U.S. EPA.


Four 55-gallon drums of waste oil were also observed in the waste storage area. This waste oil must also be registered with the MDNR-WMP and be removed by a licensed transporter.

RECOMMENDATIONS

1. Register the waste methylene chloride with the MDNR-WMP and remove and dispose of it properly.
2. Identify the unknown wastes. If hazardous, they must be registered, handled and disposed of in accordance with the hazardous waste regulations.
3. Register with the MDNR-WMP as a waste oil generator and enter into a contract with a licensed transporter for removal of the oil.

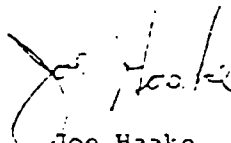
Should you have any questions regarding this report, please contact this office.

APPROVED:



F. Donald Maddox
Regional Administrator
St. Louis Regional Office

PREPARED BY:



Joe Haake
Environmental Specialist II
St. Louis Regional Office

FDM/JH/bkl

CC: Central Office - Waste Management Program

Enclosures